

UNITED STATES OF AMERICA  
DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 05-CR-01684-CBS

UNITED STATES OF AMERICA

v.

ANGEL RIVERA  
(r/n RAFAEL HEURTA)

MOTION TO JOIN MOTION TO SUPPRESS FILED BY CODEFENDANT BRITO-MELO

Now comes Angel Rivera (real name Rafael Heurta) and moves this Honorable Court to allow the defendant to join the motion to suppress filed by codefendant Brito-Melo.

In support of this motion, Heurta claims that during the week of February 20-24, defense counsel experienced computer difficulties which, caused counsel to lose work and research.

For the same reasons cited by codefendant Brito-Melo, the defendant seeks to suppress all items seized from the white Taurus, blue Saab, the Quarry Street Apartment and the Garage. The defendant was a passenger in the Taurus, was in lawful possession of the Saab, having dominion and control of the Saab, and rented the Quarry Street Apartment and the Garage.

Respectfully Submitted,  
RAFAEL HEURTA,

By his attorney:

---

J. THOMAS KERNER  
MA BBO # 552373  
Attorney at Law  
230 Commercial Street  
Boston, MA 02109  
(617) 720-5509